

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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RAYMOND JAMES & ASSOCIATES, INC.,

Plaintiff,

v.

NO. 2:18-cv-02104-JTF-tmp

50 NORTH FRONT ST. TN, LLC,

Defendant.

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DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO FILE A REPLY BRIEF, AND  
INCORPORATED MEMORANDUM OF LAW IN SUPPORT, TO PLAINTIFF’S RESPONSE  
TO DEFENDANT’S MOTION TO STAY DISCOVERY PENDING THE ADJUDICATION  
OF DEFENDANT’S MOTION TO DISMISS PLAINTIFF’S FIRST AMENDED COMPLAINT

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COMES NOW the Defendant, 50 North Front St. TN, LLC (hereinafter “Landlord”), by and through counsel, and pursuant to Local Rule 7.2(c), respectfully submits the following Motion for Leave to File a Reply Brief and Incorporated Memorandum in Support.

On April 12, 2019, Landlord filed a “Motion to Stay Discovery Pending the Adjudication of Defendant’s Motion to Dismiss Plaintiff’s First Amended Complaint”, along with a supporting Memorandum of Law. (See ECF Nos. 204 and 204-1). On April 26, 2019, the Plaintiff, Raymond James & Associates, Inc. (hereinafter “RJA”), filed “Plaintiff’s Response in Opposition to Defendant’s ‘Motion to Stay Discovery Pending the Adjudication of Defendant’s Motion to Dismiss Plaintiff’s First Amended Complaint.’” (See ECF No. 214) and “Plaintiff’s Brief in Opposition to Defendant’s ‘Motion to Stay Discovery Pending the Adjudication of Defendant’s Motion to Dismiss Plaintiff’s First Amended Complaint’” (See ECF No. 214-1).

Landlord respectfully requests leave to file a Reply Brief to address certain issues that were raised in RJA’s pleadings in opposition to Landlord’s Motion to Stay. Counsel for Landlord

consulted with counsel for RJA via telephone on May 2, 2019 about this Motion and counsel for RJA advised that RJA does not object to Landlord filing a Reply Brief to RJA's pleadings. (ECF Nos. 214 and 214-1). Landlord's request for leave is timely under Local Rule 7.2(c) as RJA's aforementioned Response and Brief were filed on April 26, 2019. Accordingly, Landlord respectfully requests leave from the Court to file the above-referenced Reply Brief. Further, if the Court grants such leave, then Landlord requests that it be permitted to file a Reply Brief by no later than Friday, May 10, 2019 (provided that Landlord receives leave to file a Reply Brief before this date). Landlord also requests permission for its Reply Brief to be ten (10) pages or less. A proposed Order granting the relief requested by this Motion will be sent by e-mail to the Court's CM/ECF inbox.

Respectfully submitted,

BLACK MCLAREN JONES RYLAND AND GRIFFEE, P.C.

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LLC*

**CERTIFICATE OF CONSULTATION**

In accordance with Local Rule 7.2(a)(1)(B), the undersigned hereby certifies that counsel for Landlord, John Ryland, consulted with counsel for RJA, Niel Prosser, via telephone on May 2, 2019 concerning this Motion and the relief requested therein. RJA's counsel advised Landlord's counsel that he does not oppose the relief sought in this Motion.

/s/ Michael G. McLaren

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of foregoing has been sent to the below-listed counsel via the Court's ECF system on this 3 day of May, 2019.

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